

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CYPRESS HOLDINGS, III, L.P., individually
and derivatively on behalf of SPORT-BLX, INC.,

Plaintiff,

v.

GEORGE HALL, JOSEPH DE PERIO, DANIEL
STRAUSS, FRANCIS RUCHALSKI, CESAR BAEZ,
CHRISTOPHER JOHNSON, SPORT-BLX, INC.,
SPORT-BLX SECURITIES, INC., CLINTON
GROUP INC., and GLASSBRIDGE ENTERPRISES,
INC.,

Defendants.

Civil Action No. 1:22-cv-1243-LGS

**DECLARATION OF ALEXANDER M. DUDELSON IN OPPOSITION
TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT
AND IN SUPPORT OF PLAINTIFF’S CROSS- MOTION FOR
SUMARY JUDGMENT**

I, ALEXANDER M. DUDELSON, declare as follows:

1. I am a member of the Bar of the State of New York and am admitted to practice before this Court. I am counsel for Plaintiff CYPRESS HOLDINGS, III, L.P. I make this declaration in opposition to Defendant’s motion for summary judgment and in support of Plaintiff’s motion for summary judgment.
2. Annexed hereto as Exhibit 1 is a true and correct copy of the Stock Purchase Agreements for Cypress’s investment in Sport-Blx, Inc. produced in discovery and bearing bates numbers SPORTBLX00028990-99, SPORTBLX00028976-95/

3. Annexed hereto as Exhibit 2 is a true and correct copy of excerpts of Joseph De Perio's deposition testimony in this action on July 6, 2023.
4. Annexed hereto as Exhibit 3 is a true and correct copy of an email chain among Michael Salerno and George Hall dated July 20, 2019, produced in discovery in this action bearing bates numbers CLINTON00007033-43.
5. Annexed hereto as Exhibit 4 is a true and correct copy of a portion of a Cap Table produced in discovery bearing bates numbers SPORTBLX02273990.
6. Annexed hereto as Exhibit 5 is a true and correct copy of the Minutes of the Special Meeting of the Board of Directors of Sport-BLX, Inc. on December 9, 2019 produced in discovery bearing bates numbers GBE_0000507-9.
7. Annexed hereto as Exhibit 6 is a true and correct copy of the Minutes of the December 9, 2019, GlassBridge Enterprises, Inc. board meeting produced in discovery bearing bates numbers GBE_0009062-3.
8. Annexed hereto as Exhibit 7 is a true and correct copy of an email containing the minutes of the 2020 annual shareholder meeting for Sport-BLX, Inc. and the proxy statement of GlassBridge Enterprises, Inc. produced in discovery bearing bates numbers SPORTBLX0265510-1, GBE_0015554-61.
9. Annexed hereto as Exhibit 8 is a true and correct copy of the Minutes of the Regular Meeting of the Board of Directors of Sport-BLX, Inc. on October 20, 2021 produced in discovery bearing bates numbers JOHNSON00000021-4.
10. Annexed hereto as Exhibit 9 is a true and correct copy of an email chain among Michael Salerno and George Hall dated December 23, 2019, produced in discovery in this action bearing bates numbers SPORTBLX00052396-7.

11. Annexed hereto as Exhibit 10 is a true and correct copy of a document bearing bates numbers SPORTBLX0267833.
12. Annexed hereto as Exhibit 12 of pages from is a true and correct copy of pages from the 2019 FY Form 10_K for Glassbridge Enterprises, Inc.
13. Annexed hereto as Exhibit 13 of pages from is a true and correct copy of pages from the 2020 FY Form 10_K for Glassbridge Enterprises, Inc.
14. Annexed hereto as Exhibit 14 of pages from is a true and correct copy of pages from the 2021 FY Form 10_K for Glassbridge Enterprises, Inc.
15. Annexed hereto as Exhibit 15 is a true and correct copy of a document bearing bates numbers SPORTBLX0264430-1.
16. Annexed hereto as Exhibit 16 is a true and correct copy of a document bearing bates numbers GBE_0014667-71.

I declare under penalty of perjury pursuant to U.S.C. § 1746 that the foregoing is true and correct.

Executed this 6th day of January 2025, in Brooklyn, New York.

/s/ Alexander M. Dudelson
ALEXANDER M. DUDELSON, ESQ.
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